

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

| | | |
|--------------------------|---|---|
| UNITED STATES OF AMERICA |) | |
| |) | Criminal Case No. <u>20-CR-80-JL-01</u> |
| v. |) | |
| |) | |
| BENJAMIN STOCKWELL |) | |
| _____ |) | |

INDICTMENT

The Grand Jury charges:

COUNT ONE

Bank Fraud - 18 U.S.C. §1344

On or about August 30, 2019, in the District of New Hampshire and elsewhere, the defendant,

BENJAMIN STOCKWELL,

knowingly executed a scheme and artifice to defraud Bank of America, a financial institution the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain money owned by and under the custody and control of Bank of America by means of false and fraudulent pretenses, representations, and promises. Stockwell knowingly negotiated a counterfeit check in the amount of two thousand two hundred and ninety-seven dollars and fifty-four cents (\$2297.54) that was purportedly written from an account at Bank of America that belonged to Dan O'Brien Kia, at a branch office of Bank of America at 620 Elm Street, Manchester, New Hampshire.

All in violation of Title 18, United States Code, Section 1344.

COUNT TWO

Bank Fraud - 18 U.S.C. §1344

On or about August 26, 2019, in the District of New Hampshire and elsewhere, the defendant,

BENJAMIN STOCKWELL,

knowingly devised a scheme and artifice to defraud Peoples Trust Company, a financial institution the deposits of which were insured by the Federal Deposit Insurance Corporation, and obtain money in custody and control of Peoples Trust Company by means of false and fraudulent pretenses, representations and promises. Stockwell fraudulently withdrew one thousand seven hundred and eighty-five dollars (\$1785) from a Peoples Trust Company account, and deposited the funds into his own account at a TD Bank automatic teller machine at 143 North Main Street, Concord, New Hampshire.

All in violation of Title 18, United States Code, Section 1344.

COUNT THREE

Bank Fraud - 18 U.S.C. §1344

On or about August 26, 2019, in the District of New Hampshire and elsewhere, the defendant,

BENJAMIN STOCKWELL,

knowingly executed a scheme and artifice to defraud Peoples Trust Company, a financial institution the deposits of which were insured by the Federal Deposit Insurance Corporation, and to obtain money owned by and under the custody and control of Peoples Trust Company by means of false and fraudulent pretenses, representations, and promises. Stockwell knowingly negotiated a counterfeit check in the amount of five thousand dollars (\$5,000) that was purportedly written from an account at Peoples Trust Company that belonged to M.C., and deposit it into his own account at TD Bank, at a branch office located at 143 North Main Street, Concord, New Hampshire.

All in violation of Title 18, United States Code, Section 1344.

COUNTS FOUR THROUGH SIX
[18 U.S.C. § 1028A – Aggravated Identity Theft]

On or about the below listed dates, in the District of New Hampshire, the defendant,

BENJAMIN STOCKWELL,

did knowingly possess and use, without lawful authority, a means of identification of another person—specifically the names and forged signatures of the individuals described below—during and in relation to the offense of bank fraud in violation of Title 18, United States Code, Section 1344 as charged in Counts One, Two, and Three:

| COUNT | DATE | NAME |
|-------|---------|------|
| FOUR | 8/30/19 | L.J. |
| FIVE | 8/26/19 | J.N. |
| SIX | 8/26/19 | M.C. |

In violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

Dated: August 17, 2020

~~—/s/ Grand Jury Foreperson~~
FOREPERSON

SCOTT W. MURRAY
United States Attorney

By: /s/ Georgiana L. Konesky
Georgiana L. Konesky
Assistant U.S. Attorney